

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

Sease Michael Beard
Plaintiff,
v.
Doris Falkenrath, et al.,
Defendants

FILED at JCCC and Entered
12/1/21 by SK. 2 pages
Date Initials No.

Case No. 2:21-CV-04211-GRB

MOTION FOR LEAVE TO FILE
AN AMENDED COMPLAINT

Plaintiff Sease Michael Beard, pursuant to Rules 15(a) and 19(a), Fed. R. Civ. P., requests leave to file an amended Complaint Correcting a name and information.

1. The Plaintiff in her original Complaint did not know the correct name of corrected Defendant and corrected information.

2. Since the filing of the Complaint the Plaintiff has determined that the names of the Defendants are Carignan, Jeremy Epps, Nathan Falter and, Doris Falkenrath. Paragraphs are amended to show the identity and the actions of officers.

(ATTACHMENT)

3. This Court should grant leave freely to amend a Complaint. *Forman v. Davis*, 371 U.S. 178, 182 (1962)

Date: 11-30-2021

Respectfully Submitted
Sease Michael Beard #1251289

LMR

Jefferson City Correctional Center
8200 NO More Victims Road
Jefferson City, MO 65101